

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	Civil Action No. 2:24-cv-02029-TLP-tmp
)	
Plaintiff,)	
)	
v.)	
)	
PATRIOT BANK,)	
)	
Defendant.)	
)	

**UNOPPOSED MOTION AND MEMORANDUM IN SUPPORT TO TERMINATE
CONSENT ORDER AND DISMISS WITH PREJUDICE**

Plaintiff United States of America (“United States”), by and through undersigned counsel, files this unopposed motion to provide the Court with a status update and to respectfully request termination of the Consent Order and dismissal of this case with prejudice.

The Court entered a Consent Order in this case on January 30, 2024 (Doc. 11). The Consent Order states that its requirements will remain in effect for three years, or longer if Patriot Bank opts to extend or it has not invested all money in the loan subsidy fund. (*Id.* ¶¶ 51 – 53). The Consent Order also states that other modifications may be made upon approval of the Court, by motion by any Party, and that the Parties will work cooperatively to discuss and attempt to agree to proposed modifications. (*Id.* ¶ 55).

In support of this motion, the United States advises the Court that Patriot Bank has demonstrated a commitment to remediation and has reached substantial compliance with the monetary and injunctive terms of the Consent Order. Patriot has also committed to continuing its disbursement of the loan subsidy fund (*id.* ¶ 23) and to provide the United States confirmation of that disbursement upon completion.

The United States has conferred with Patriot Bank, which does not oppose this motion.

WHEREFORE, for these reasons, Plaintiff United States respectfully requests that the Court enter the attached Proposed Order terminating the Consent Order and dismissing this case with prejudice.

Respectfully submitted this 23rd day of May, 2025.

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Certificate of Counsel

I hereby certify that the parties conferred regarding the contents of this motion on May 20, 2025 and May 23, 2025 and agreed as to the issues and relief requested by this motion.

/s/ Jenna A. Raden
Jenna A. Raden
Counsel for United States

Certificate of Service

I hereby certify that on May 23, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filings to all counsel of record.

/s/ Jenna A. Raden
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Counsel for United States